

REMARKS

This paper is being submitted in response to the Office Action mailed in the application on January 6, 2005. Claims 41, 47, 48, 51, 53 and 55 have been amended. Claims 56 and 57 have been cancelled without prejudice.

The Examiner has rejected applicant's claims 47, 50, 53 and 54 under 35 U.S.C. § 102(b) as being anticipated by the Pfeiffer, et al. (U.S. 5,146,592) patent. The Examiner has also rejected applicant's claims 41, 43, 48, 49, 51, 52 and 55-57 under 35 U.S.C. §103(a) as being unpatentable over the Pfeiffer, et al. patent in view of the Hamada, et al. (U.S. 5,826,035) patent. As noted above, applicant's claims 56 and 57 have been cancelled, rendering the Examiner's rejections thereto as moot. With respect to applicant's remaining claims, as amended, the Examiner's rejections are respectfully traversed.

Applicant's independent claim 41 has been amended to recite an image capture apparatus comprising an image capture unit adapted to capture image data, a memory adapted to store the image data captured by the image capture unit, an image compression unit adapted to compress the image data stored in the memory, an image display unit adapted to display an image using the image data stored in the memory, a control unit adapted to control the image capture apparatus and a refresh control unit coupled to the memory and adapted to refresh the memory, wherein the image capture apparatus further comprises an arbitration unit adapted to assign a higher priority to a process of providing image data from the image capture unit to the memory than a process of refreshing the memory, to assign a higher priority to a process of refreshing the memory than a process of providing image data from the memory to the image compression unit and to assign a higher priority to a process of providing image data from the memory to the image display unit than a process of refreshing the memory, and wherein the

image capture apparatus is capable of performing a process of displaying an image using the image data stored in the memory in parallel with a process of compressing the image data stored in the memory.

Applicant submits that the features recited in applicant's independent claim 41 are not taught or suggested by the cited Pfeiffer, et al. and Hamada, et al. patents. More particularly, the Examiner has stated that the Pfeiffer, et al. patent teaches "assigning a higher priority to a process that the control unit uses the memory (screen refresh) than a process of providing image data from the memory to the image algorithm processor." This is described in the Pfeiffer, et al. patent at column 23, lines 27-34 as follows: "According to the invention, the screen refresh function of the video DRAM shift registers is given top priority, followed by refresh of the dynamic random access memory cells, and then address request from the image algorithm processor 66."

The Pfeiffer, et al. patent also teaches in column 11, lines 4-18, that the driving of the video monitor 28 occurs as follows: "In providing a constant raster stream of refresh data to the video monitor 28, the image memory controller 68 calculates addresses for driving the image memory address bus 92, which addresses are directed to the image memory 82 for enabling the image memory controller 68 to access the image memory 82. The image memory controller 68 then posts a cycle in an internal arbiter (not shown) indicating that the image algorithm processor 66 desires to access the image memory 82. If no other events of higher priority are required to be carried out, then on the next operating cycle the image memory controller 68 accesses the memory for providing an output to the video processor 106, and through the color lookup tables 108 to the video monitor 28."

Thus, in the Pfeiffer, et al. patent, the screen refresh function is given top priority and, in particular, priority over the access requests from the image algorithm processor 66 which, in turn, controls data flow to the video monitor 28. The patent, therefore, appears to teach that the refresh function has priority over the video monitor display function. In contrast, applicant's amended independent claims 41 and 47 recite assigning a higher priority to a process of providing image data from the memory to the image display unit than a process of refreshing the memory, and wherein the image capture apparatus is capable of performing a process of displaying an image using the image data stored in the memory in parallel with a process of compressing the image data stored in the memory.

Accordingly, the Pfeiffer, et al. patent does not teach or suggest the features of applicant's amended claims 41, and its respective dependent claims. The same is true with respect to the Hamada, et al. patent.

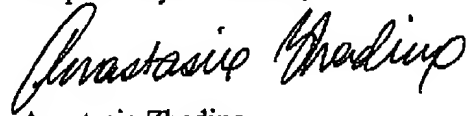
Specifically, the Hamada, et al. patent discloses a system in which image data is first stored in a memory, then it is read from the memory and displayed on a projection screen. The image data can then be compressed or expanded. Col. 8, line 54 through Col. 9, line 5. The Hamada, et al. patent is thus also devoid of any teaching or suggestion of assigning a higher priority to a process of providing image data from the memory to the image display unit than a process of refreshing the memory, and wherein the image capture apparatus is capable of performing a process of displaying an image using the image data stored in the memory in parallel with a process of compressing the image data stored in the memory. Again in the Hamada, et al. patent, the processes of storing the data, displaying the data and compressing or expanding the data occur in sequence, with storing occurring first, displaying second and compression or expansion third. The combination of the Pfeiffer, et al. patent and the Hamada,

et al. patents, therefore fails to teach or suggest the features of applicant's amended claim 41, and its respective dependent claims.

In view of the above, it is submitted that applicant's claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested. If the Examiner believes that an interview would expedite consideration of this Amendment or of the application, a request is made that the Examiner telephone applicant's counsel at (212) 790-9200.

Dated: March 21, 2005

Respectfully submitted,



Anastasia Zhadina
Reg. No. 48,544

COWAN, LIEBOWITZ & LATMAN, P. C.
1133 Avenue of the Americas
New York, New York 10036
T (212) 790-9200